

# Office of the Chapter 13 Standing Trustee

*Isabel C. Balboa, Chapter 13 Standing Trustee*†

*Jane L. McDonald, Counsel*  
*Raymond H. Shockley, Jr., Staff Attorney*  
*Jennifer R. Gorchow, Staff Attorney*

*Jennie P. Archer\**  
*Kelleen E. Stanley\**  
*Lu'Shell K. Alexander\**  
\*Certified Bankruptcy Assistant  
†Fellow, American College of Bankruptcy

April 15, 2020

The Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court  
P.O. Box 2067  
Camden, New Jersey 08102

**RE: Chapter 13 Bankruptcy  
Case No. 18-28694 (ABA)  
Debtor(s) Name: Rodney W. Brown and Kathleen M. Brown**

Dear Judge Altenburg:

Please accept this letter in lieu of a more formal response to the Motion for Authorization to Enter Into Final Loan Modification Agreement.

Select Portfolio Servicing, Inc., through its counsel, comes before the Court nineteen (19) months after the filing of the Chapter 13 Bankruptcy Petition, on a Motion for Authorization to Enter Into Final Loan Modification Agreement with Debtor. While the Trustee does not oppose the motion, the Trustee objects to the proposed form of Order.

The Trustee respectfully requests the secured creditor be required to submit an amended proposed Order to the Judge's chambers in accordance with the Local Mandatory Forms effective December 17, 2019. Secured creditor may obtain the correct form of order from the Clerk's office or on the Court's website: [www.njb.uscourts.gov/forms](http://www.njb.uscourts.gov/forms).

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully submitted,

*/s/ Isabel C. Balboa*  
Isabel C. Balboa  
Chapter 13 Standing Trustee

ICB/jpa  
cc: R.A. Lebron, Esquire (via CM/ECF)  
Lee M. Perlman, Esquire (via CM/ECF)  
Rodney and Kathleen Brown (via Regular Mail)